

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Civil Division**

<b>ADELINA C. ROCABRUNA, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No.: 1:12-cv-506-LMB/TCB</b>
	)	
<b>BANK OF AMERICA, N.A.,</b>	)	
	)	
<b>Defendant.</b>	)	
	)	

**AMENDED NOTICE OF HEARING ON PLAINTIFFS' MOTION  
TO COMPEL DEPOSITIONS AND WRITTEN DISCOVERY**

PLEASE TAKE NOTICE that on Friday, October 12, 2012, at 10:00 a.m., or as soon as the motion may be heard, the Plaintiffs shall move the Court pursuant to Fed. Rule Civ. P. 37(c)(1) for an order extending the time to complete discovery from October 18, 2012, to November 8, 2012; providing a three week extension to the deadline for Plaintiffs' Rule 26(a)(3) disclosures; overruling Defendant's discovery objections; compelling Defendant to produce its Rule 30(b)(6) designee(s) without objections; compelling Defendant to produce for depositions Janet Cleversy and Erlysha Hill; ACDV operators; and the person most responsible for the management of the Indian ACDV facility; and compelling Defendant to produce documents and respond to written discovery without limitation.

Plaintiffs originally noticed this motion for October 5, 2012, but were instructed to re-notice the motion for October 12, 2012, due to the Judicial Conference.

Respectfully submitted,  
ADELINA AND MIGUEL ROCABRUNA

By \_\_\_\_\_/s/\_\_\_\_\_  
Of Counsel

Kristi C. Kelly, Esq., VSB #72791  
Andrew J. Guzzo, Esq., VSB # 82170  
SUROVELL ISAACS PETERSEN & LEVY PLC  
4010 University Drive, 2nd Floor  
Fairfax, VA 22030  
Telephone: (703) 277-9774  
Facsimile: (703) 591-9285  
Email: kkelly@sipfirm.com  
Email: aguzzo@sipfirm.com

Leonard A. Bennett, VSB # 37523  
Susan M. Rotkis, VSB # 40693  
CONSUMER LITIGATION ASSOC., P.C.  
763 J. Clyde Morris Blvd., Suite 1A  
Newport News, Virginia 23601  
Telephone: (757) 930-3660  
Facsimile: (757) 930-3662  
Email: lenbennett@clalegal.com  
Email: srotkis@clalegal.com  
*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been filed in the CM/ECF system, which shall electronically forward it to the following on this 1<sup>st</sup> day of October, 2012, as follows:

Anand Vijay Ramana  
McGuire Woods, LLP  
2001 K Street NW  
Suite 400  
Washington, DC 20006-1040  
E-mail: [aramana@mcguirewoods.com](mailto:aramana@mcguirewoods.com)

Brian Emory Pumphrey  
McGuireWoods LLP  
901 E Cary St  
Richmond, VA 23219-4030  
Email: [bpumphrey@mcguirewoods.com](mailto:bpumphrey@mcguirewoods.com)

/s/

---

Andrew J. Guzzo, Esq.,  
Virginia State Bar No. 82170  
SUROVELL ISAACS PETERSEN & LEVY PLC  
4010 University Drive, 2nd Floor  
Fairfax, VA 22030  
Telephone: (703) 277-9766  
Facsimile: (703) 591-9285  
Email: [aguzzo@sipfirm.com](mailto:aguzzo@sipfirm.com)  
*Counsel for Plaintiffs*